

1155 AVENUE OF THE AMERICAS, NEW YORK, NY 10036-2711

JENNER & BLOCK LLP


June 21, 2024

Application **GRANTED**. The parties may file their summary judgment materials under temporary seal. Summary judgment briefing will be complete on August 30, 2024. In accordance with the parties' proposed schedule, the parties may each file a letter on ECF by **September 27, 2024**, stating what portions, if any, of the summary judgment record which that party seeks to maintain under seal. Any portion of the record that a party does not seek continued sealed treatment regarding will be ordered unsealed. So Ordered.

VIA ECF

The Clerk of Court is respectfully directed to close the motion at ECF No. 269.

The Honorable Dale E. Ho
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007


Dale E. Ho
United States District Judge
Dated: June 24, 2024
New York, New York

Re: *Watson v. NY Doe 1 et al.*, No. 19 Civ. 533 (DEH) (VF)

Dear Judge Ho,

Plaintiff and Counterclaim Defendant Ralph Watson ("Plaintiff") and Defendants and Counterclaimants NY Doe 2 and Illinois Doe 1 ("Defendants") (collectively, the "Parties") write jointly to respectfully request that the Court allow the Parties to provisionally file their summary judgment briefing, 56.1 statements, and exhibits under seal as set forth below. Defendants' motions for summary judgment are due next week, on June 28, 2024. *See* Dkt. 267.

The Parties' proposed procedure would serve the goal of Party and judicial efficiency by deferring resolution of any confidentiality disputes until the summary judgment motions are fully briefed. Further, given the existing protective orders in this case protecting the identities of the defendants and non-party witnesses, Dkts. 93, 265, allowing the Parties to initially file the summary judgment materials under seal will ensure that no confidential information is filed on the public docket.

Accordingly, the Parties request Court approval of the following filing procedure:

- The Parties' briefs and evidentiary materials related to the Parties' summary judgment motions shall be filed provisionally under seal.
- Within 14 days following completion of briefing on the Parties' motions for summary judgment, each Party shall identify to the opposing side the portions of the filings which it claims should be maintained under seal. Objections to the unsealing of portions not thus identified are waived, and those portions shall promptly be unsealed by the Parties on a mutually agreed upon date and time.
- Within 7 days following the Parties' identification of portions to be maintained under seal, the Parties shall meet and confer with respect to contested items.

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- Within 7 days following such meet-and-confer, the Parties shall submit motions to the Court to maintain their proposed redactions under seal.

Respectfully submitted,

/s/ Laura P. MacDonald

Laura P. MacDonald

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Counsel for Defendant and Counterclaimant NY Doe 2

/s/ David J. Grech

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